

Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, D.C. 20554

Re: CC Docket No.
02-33

Notice of
Proposed Rulemaking (FCC 02-42)

Dear Ms. Dortch:

On behalf of WarpSpeed Internet & Wireless Networking Solutions, I am writing to express my support for the comments filed on the above-referenced proceeding by The Wireless Communications Association International, Inc. ("WCA"), and to urge the Commission not to impose Universal Service Fund obligations on smaller license-exempt providers of wireless broadband services.

I am a start up company with myself as the only employee. Since May of 2001, I have been using the 2.4 GHz license-exempt band to provide high-speed Internet access to communities, where there is little or no cable modem or DSL service. Even where cable modem or DSL is available, wireless is the only competitive alternative. Despite our small size and lack of funding from the government or the capital markets, we have been able to provide our customers with the type of broadband service usually available only in the larger cities, and we are doing so at an affordable price. I also provide broadband service to public/private ventures between the Navy and construction organizations, giving those entities the ability to use broadband to deliver better and more cost-efficient services to their constituents.

Like any other small business, we face many daunting economic challenges but have only limited resources available to us. We therefore are very concerned about the possibility that the Commission will subject us to USF reporting and contribution obligations. I fear that our annual cost of complying with USF reporting obligations, and the time necessary for the additional work, would heavily tax or possibly prevent me from continuing business as usual. This is not including the additional costs associated with explaining USF charges to subscribers and dealing with any subsequent subscriber complaints.

While we generally support the broad objectives of universal service, we do not believe it is equitable to sacrifice the future of wireless broadband (which operates without subsidy) to support "copper wire" services that wireless is better equipped to provide in under-served areas. Also, we are not an ILEC or a cable MSO, and we simply cannot afford the personnel or administrative resources necessary for USF compliance. Any diversion of what little staff we have will have a direct and immediate adverse effect on our ability to serve our customers. Our business, in other words, would be put at unnecessary risk, and our customers ultimately would pay the price.

We therefore urge the Commission to take these considerations into account and, at a minimum, not impose USF reporting and contribution obligations on smaller license-exempt providers of broadband service. Thank you.

Very truly yours,

Eric L. Johnson
WarpSpeed Internet
Owner/Operator